

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Amendment of Part 15 of the Commission's	)	WT Docket No. 14-165
Rules for Unlicensed Operations in the	)	
Television Bands, Repurposed 600 MHz Band,	)	
600 MHz Guard Bands and Duplex Gap, and	)	
Channel 37, and	)	
	)	
Amendment of Part 74 of the Commission's	)	
Rules for Low Power Auxiliary Stations in the	)	
Repurposed 600 MHz Band and 600 MHz	)	
Duplex Gap	)	
	)	
Expanding the Economic and Innovation	)	GN Docket No. 12-268
Opportunities of Spectrum Through Incentive	)	
Auctions	)	
	)	
Promoting Spectrum Access for Wireless	)	GN Docket No. 14-166
Microphone Operations	)	

**COMMENTS IN SUPPORT OF MOTION FOR EXTENSION OF TIME**

Audio-Technica U.S., Inc. ("A-T") submits these comments in support of the Motion for Extension of Time to File Comments ("Motion") submitted by Shure Incorporated ("Shure") in the above captioned proceedings on December 2, 2014. In that Motion, Shure has requested a modest 45-day extension of the comment and reply deadlines to February 19, 2015 and March 12, 2015 respectively.

A-T is a manufacturer of high-performance wireless microphones and in-ear monitors for home and professional use and has been an active participant in the Commission's proceedings to allow unlicensed devices to operate within the television white spaces ("WSDs") and to establish rules to ensure that such operations do not interfere with licensed and unlicensed

wireless microphones. A-T acknowledges the difficult task faced by the Commission in attempting repack full power and low power television broadcast stations into a significantly reduced television broadcast band following the scheduled incentive auction and to accommodate licensed and unlicensed wireless microphone users and unlicensed white space devices within the remaining spectrum that has not been repurposed for commercial wireless services. However, as difficult as that task is, the scope of the rule changes upon which the Commission has asked for comment is sufficiently far reaching and complex to justify granting Shure's modest extension request.

The Commission's actions in these proceedings will be a game changer, not only for manufacturers like A-T and Shure that must develop new products and technologies within the parameters to be established by the Commission, but also for content creators, such as media outlets, new organizations, the sports and entertainment industries, churches, schools and theaters, just to name a few, that rely on wireless microphones to fulfill their missions. There is little doubt that ability of wireless microphone users to find sufficient suitable UHF spectrum for content creation will be significantly impaired regardless of the ultimate outcome of these proceedings and this will require such users to have access to significant additional spectrum that is suitable for wireless microphone operations and require manufacturers such as A-T to develop new products and new technologies that will allow wireless microphones to adapt to the operating parameters and existing RF environment for this new spectrum.

Even with respect to UHF spectrum that will remain available for licensed and unlicensed wireless microphone use, the Commission has proposed significant and far reaching changes to

the various key technical parameters governing wireless microphone use, including the reduction of maximum output power levels for wireless microphones in certain instances while at the same time allowing for increased power levels and antenna heights for fixed white space device operations, changes in the methodology of calculating minimum distances from television operations for both wireless microphones and WSDs, and allowing portable WSD operations on frequencies presently limited to fixed WSD operations and that are shared with wireless microphones. The impact of these proposed changes are significant and will take additional time to understand and quantify.

Furthermore, the Commission asks for comment on newly proposed equipment authorization and certification obligations of wireless microphone manufacturers. Such obligations raise complicated issues regarding the adoption of rebate and consumer education requirements to relocate existing microphone users out of spectrum bands that will be reclaimed for auction and the retirement of deployed equipment well in advance of the end of its useful life. The Commission has requested comment on the feasibility of mandating design changes to wireless microphone systems, such as the incorporation of geolocation capabilities that may not be presently feasible or appropriate. Additional time is required understand the impact the Commission's proposals in this area and to evaluate the feasibility and desirability of any new obligations that are proposed.

Finally, the Commission asks for comment on a number of different frequency bands that might be made available for wireless microphone use to replace the UHF spectrum that is expected to be reclaimed. Each of the spectrum bands on which comment is requested represents

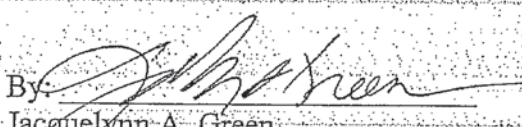
a unique RF environment that would be shared with unique users and each such band is governed by unique Commission operational and technical rules that will have to be examined in light of existing products and the potential for new product development. Additional time would greatly benefit this process.

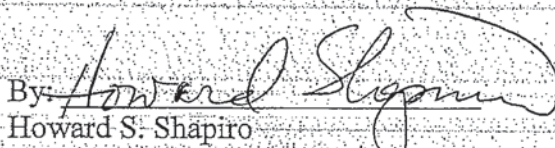
A-T notes that the modest extension of time would not cause any hardship to the public or to the Commission and would point out that the Commission has already decided to delay the incentive auction for reasons unrelated to these proceedings. A-T believes that Shure has more than met its burden of demonstrating that its requested extension of time would benefit the public discourse in this proceeding without causing any harm to the public interest.

For the reasons set forth above, Audio-Technica U.S., Inc. respectfully requests that the Commission grant Shure's motion for an extension of time to file comments and reply comments in the above-captioned proceedings.

Respectfully submitted,

**AUDIO-TECHNICA U.S., INC.**

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Audio-Technica Comments  
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